SHINE™
BROS. CORP.
SCRAP IRON & METAL

Via US Mail and e-mail (bergin.sean@epa.gov)

June 22, 2012

Mr. Sean P. Bergin
USEPA Region 7
901 N. 5th Street
Kansas City, KS 66101-2907

Subject: Air Inspection of Shine Bros. Corp.
225 10th Avenue SE / 528 E. Park St., Spencer, IA 51301

Dear Mr. Bergin:

We have reviewed your air inspection report and offer the following comments:

Construction Permit No. 98-A-914 (Dry Chemical Storage Silo)

Due to the silo being loaded every other month, the total amount of air flowing through the internal baghouse (Belle Style Dust House) amounts to approximately 252,000 cubic feet per year. Iowa DNR has agreed that the permit will be amended to remove the particulate testing and be replaced with a "No Visible Emissions" or "No VE" standard with a requirement to conduct an opacity test.

Construction Permit No. 98-A-917 (EP-04)

IDNR is reviewing the new permit application to adjust some items to reflect operating conditions. The stack test, conducted in September 2011, demonstrates that total PM emissions are at 0.47 lb/hr, well below the permit requirements of 1.2 lb/hr for PM_{10}. The stack size is too small to measure PM_{10} in the field.

Under "additional equipment," you stated that you observed a wire chopping operation that was not permitted. That particular piece of equipment is a pre-chopper, designed to create smaller pieces of wire from large pieces. The pre-chopper was installed prior to 1998 when the permit was last adjusted. The permit for EP-04 includes the pre-chopper, although the equipment is not connected to the cyclone separator. Basically, the pre-chopper is loaded from the top and cut wire is discharged at the bottom. There can be no hood over the equipment as that would interfere with loading wire into the machine using a skid steer or loader. We have been in discussions with IDNR as to what permit modifications, if any, may be necessary.

Construction Permit No. 98-A-918 (EP-05)

IDNR is reviewing the stack test conducted on EP-04 as a means of translating to emissions generated by EP-05. At present, either a stack test will be conducted directly on EP-05 or air dispersion modeling will be conducted.

A door was recently installed, as per your recommendation, on the west side of the building where the southern cyclone loads the roll-off box. This has reduced the amount of material that was observed accumulating on the pavement outside the building, and therefore will greatly reduce the potential for material to migrate off-site through stormwater conveyance.

We will continue to work with IDNR on items of concern to the Agency to clear up any items regarding air emissions. Additional stack testing or dispersion modeling will take place in the near future to clarify those items.

Should you have any questions or concerns, please call me at (712) 262-5579, ext. 121.

Sincerely,

SHINE BROS. CORP.

Mike Wycoff, Plant Manager

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

MAY 16 2012

Mike Wycoff
Shine Brothers Corp.
528 E. Park
Spencer, IA 51301

Dear Mr. Wycoff:

On April 10, 2012, a representative of the U. S. Environmental Protection Agency (EPA) inspected your facility. The inspection was conducted under the authority of the Clean Air Act. A copy of the inspection report is enclosed for your information.

EPA is presently reviewing the findings of the report to determine your facility's compliance with the applicable statutes, permits, or regulations. If it is determined that violations exist, EPA reserves all rights it may have to take appropriate enforcement action.

If there are any questions regarding this report or actions that you may want to take, please contact me at (913) 551-7599.

Sincerely,

Lisa T. Hanlon

Lisa T. Hanlon
Air Permitting and Compliance Branch

Enclosure

AIR COMPLIANCE INSPECTION REPORT
U.S. Environmental Protection Agency
Region VII
Environmental Services Division

SHINE BROTHERS CORPORATION
528 EAST PARK
SPENCER, IOWA 51301

TELEPHONE NUMBER: (712) 262-5579

AFS PLANT I.D. IA-041-00019

APRIL 10, 2012

INTRODUCTION

At the request of the Air and Waste Management Division (AWMD), the Environmental Field Compliance Branch (EFCB), conducted an unannounced Full Compliance Evaluation (FCE) inspection of Shine Brothers Corporation, located in Spencer, Iowa. This inspection was conducted in conjunction with a multimedia inspection which also included a stormwater compliance evaluation, conducted by Mr. Green (EPA). During the FCE, a Level B multimedia screening inspection was performed. Please see Attachment 1 for a copy of the multimedia screening inspection checklist.

Air Program: SIP

Facility Classification Code: Minor

PARTICIPANTS

Shine Brothers Corporation (Shine Brothers):
Mike Wycoff, Plant Manager
mike@shinebros.com
Eva Shine, Business Manager/Corporate Attorney
eva@shinebros.com

Iowa Department of Natural Resources (IDNR):
Amber Wolf, Environment Specialist
Thomas Roos, Environmental Specialist

U.S. Environmental Protection Agency (EPA):
Sean P. Bergin, Environmental Scientist
Peter M. Green, Environmental Scientist

INSPECTION PROCEDURES

Upon arrival at Shine Brothers, Mr. Green, Ms. Wolf, Mr. Roos, and I met with Mr. Wycoff and Ms. Shine. We presented our credentials and explained the purpose of the inspection and the procedures we

wished to follow. I then asked Mr. Wycoff and Ms. Shine questions about the facility and facility operations. Following that, Mr. Wycoff and Ms. Shine conducted a tour of the facility.

During the inspection, I reviewed the operating, monitoring and maintenance records that Shine Brothers are required by their construction permits to collect and maintain. I also reviewed the Shine Brothers operations to identify areas subject to federal and state regulations not identified in their construction permits. Mr. Wycoff signed and was provided a copy of the Confidentiality Notice (Attachment 2), and Receipt for Documents and Samples (Attachment 3).

Additional information included in this report was obtained from the Iowa Department of Natural Resources (IDNR).

At the conclusion of the inspection, an exit interview was conducted. During the exit interview I discussed my preliminary inspection findings with Mr. Wycoff and Ms. Shine. A Notice of Preliminary Findings was not issued at the time of the inspection.

PROCESS/FACILITY DESCRIPTION

Shine Brothers is a metal salvage and recycling facility, specializing in wire chopping and auto shredding. The Shine Brothers facility covers approximately 40 acres of land and is located in southeast Spencer, on the north bank of the Little Sioux River. Air emission source equipment include: wire chopping lines, balers, industrial shears and an automotive shredder. The wire chopping lines are used to separate wire insulation from the wire. The wire insulation is stabilized and hauled to a landfill for use as cover material, the wire itself is then sold to customers as recycled material.

Shine Brothers is authorized by the state of Iowa to operate air emission source equipment through five construction permits. An aerial photograph of Shine Brothers, with annotated locations of the permitted equipment can be found in Attachment 4, Photograph #1.

Establishments involved as recyclable material merchant wholesalers have a Standard Industrial Classification (SIC) number 5093 and a North American Industrial Classification System (NAICS) number 423930.

OBSERVATIONS/FINDINGS

During the inspection, no visible emissions were observed leaving the site. Shine Brothers employs approximately 120 people and typically operates 24 hours per day, 6 days per week.

Throughout this document the following formatting conventions will be used. Regulatory citations will be in bold print, regulatory requirements will be in italics and the inspection findings will be in regular text.

The following are regulatory requirements of Shine Brothers, followed by the EPA findings and observations, based on the April 10, 2012, inspection.

Applicable Requirements:

Construction Permit number 98-A-914
October 22, 1998
Source: **Dry Chemical Storage Silo (EP-01)**
Control Equipment: **Baghouse (Belle Style Dust House)**
Compliance Testing Requirements: *PM_{10}, Opacity*
Operating Limits:
Shine Brothers Corporation is limited to 20% opacity except during a period of startup, shutdown, or cleaning of control equipment. The amount of chemical fed into the silo cannot exceed 50,000 pounds per hour.
Operating Condition Monitoring:
Operating condition monitoring is not required at this time.

Construction Permit number 98-A-914 can be found in Attachment 5. The Dry Chemical Storage silo houses a phosphate based chemical, used to bind metals found in wire insulation, before shipping the insulation to a landfill. Control equipment for EP-01 is a compact dust collector. The filter is checked periodically, and changed when necessary. The bag filter unit exhausts through a vent outside the building. I observed the vent outside the building and did not observe opacity associated with the vent.

The Construction Permit requires Shine Brothers to conduct performance tests for PM_{10} and opacity on EP-01. The required performance tests have not been conducted to date. Ms. Wolf (IDNR) told me that IDNR has recently required Shine Brothers to conduct stack tests, and that Shine Brothers is planning to submit new permit applications so that the permits accurately reflect on-site conditions.

Shine Brothers is not required to maintain records of the amount of chemical fed into the silo. However, Mr. Wycoff told me that Shine Brothers receives approximately 40,000 pounds of chemical every other month, or approximately 20,000 pounds per month. More accurate records can be obtained from Shine Brothers if necessary.

Construction Permit number 98-A-917
October 22, 1998
Source: **Choppers and Pre-Shredder (EP-04)**
Control Equipment: **Baghouse and Cyclone**
Compliance Testing Requirements: *TSP, PM_{10}, Pb*
Operating Limits:
Shine Brothers Corporation is limited to 20% opacity except during a period of startup, shutdown, or cleaning of control equipment. The rate of metal fed to the cyclone cannot exceed 1,798 pounds per hour.
Operating Condition Monitoring:
Operating condition monitoring is not required at this time.

Construction Permit number 98-A-917 can be found in Attachment 6. EP-04 is a wire chopper and pre-shredder for aluminum wire. According to Mr. Wycoff, a baghouse has never been associated with EP-04, control equipment is a cyclone only. Shine Brothers is limited to 20% opacity except during a period of startup, shutdown, or cleaning of control equipment. At the time of the inspection, EP-04 was operating, and I did not observe opacity associated with the cyclone stack.

The Construction Permit requires Shine Brothers to conduct performance tests for TSP, PM_{10} and Pb. Shine Brothers conducted a successful Performance Test of PM_{10} and TSP on September 22, 2011 (more than 10 years later than required by the Construction Permit). A Performance Test for Pb has not been conducted to date. Ms. Wolf (IDNR) told me that IDNR has recently required Shine Brothers to conduct stack tests, and that Shine Brothers is planning to submit new permit applications.

Shine Brothers is not required to maintain records of the rate of metal feed to the permitted cyclone. Mr. Wycoff told me that EP-04 is operating below the 1,798 lbs/hr feed rate, and that records can be obtained from Shine Brothers if necessary. Because maintenance of the records of the feed rate are not a permitted requirement, Mr. Wycoff and Ms. Shine believe these records, if requested, should be treated as Confidential Business Information.

Construction Permit number 98-A-918
October 22, 1998
Source: **Wire Chopping Process (EP-05)**
Control Equipment: **Cyclone**
Compliance Testing Requirements: *TSP, PM_{10}*
Operating Limits:
Shine Brothers Corporation is limited to 20% opacity except during a period of startup, shutdown, or cleaning of control equipment. The throughput of the wire chopping process cannot exceed 14,285.7 pounds per hour.
Operating Condition Monitoring:
Record the amount of material fed to the process every hour.

Construction Permit number 98-A-918 can be found in Attachment 7. EP-05 is used primarily to chop copper wire. Control equipment associated with EP-05 is not one cyclone, but two cyclones. According to Mr. Wycoff, at the time of permit issuance, one cyclone was installed. On August 16, 2006, Shine Brothers contacted IDNR (Des Moines) through CPI Environmental Services Inc., notifying IDNR that Shine Brothers intended to install a second cyclone in association with EP-04 (Attachment 8). Shine Brothers proposed to install a second cyclone to produce a higher quality product. As explained in the attached correspondence, Shine Brothers perceived the installation of a second cyclone as a modification exempt from construction permit application requirements, because the installation of a second cyclone would not increase the throughput of EP-05, and therefore would not increase emissions. IDNR Field Office #3 does not have a filed response from IDNR (Des Moines) to the request to install a second cyclone, nor do Shine Brothers.

Shine Brothers Corporation is limited to 20% opacity except during a period of startup, shutdown, or cleaning of control equipment. At the time of the inspection, EP-05 was operating, and I did not observe opacity from either stack. However, the area around the north cyclone, including the roof, was littered with debris (wire insulation, or fluff) that had exited the cyclone stack (see Photographs #2 and #3, Attachment 4). Considering the amount of debris in the area of the stack, and the proximity of the stack to the property line, it is reasonable to assume that airborne debris from the stack could leave the Shine Brothers property and deposit in the surrounding area. Mr. Wycoff said that some debris does exit the stack, for a few minutes, during periods of startup.

Photograph #4, Attachment 4, is a photograph of the loadout area for the southern cyclone of EP-05. The roll-off for the southern cyclone is housed in a building that is open to the west. In the photograph, airborne debris is clearly visible. I observed the building, with consideration of my position relative to the sun, and observed a slight opacity, but not an opacity that I would consider to be near 20%. I did not perform a Method 9 Visible Determination of Opacity Emissions. I suggested to Mr. Wycoff that enclosing the loadout building would reduce airborne emissions. The airborne debris observed could leave the Shine Brothers property and deposit in the surrounding area.

The Construction Permit requires Shine Brothers to conduct a performance test for TSP and PM_{10} (the performance test is required for the permitted cyclone, any performance test requirements for the additional cyclone are unknown). Shine Brothers has not conducted a performance test on the cyclone. However, Ms. Wolf (IDNR) told me that the performance test conducted on EP-04 might satisfy the requirements for a performance test on EP-05. Shine Brothers is planning to submit new permit applications.

Shine Brothers is required to record the amount of material fed to the process every hour. Following the inspection, Mr. Wycoff submitted hourly throughput totals from January 1, 2011 through April 10, 2012 (Attachment 9). During this time period, based on the data provided by Shine Brothers, Shine Brothers did not exceed their permitted throughput limit of 14,285.7 pounds per hour.

Construction Permit number 73-A-32
February 1, 1973
Source: **300# Per Hour Class VI Incinerator With Pollution Abatement System (EP-06)**
Control Equipment: **Afterburners**
Compliance Testing Requirements: *No Compliance Testing Requirements*
Operating Limits:
Shine Brothers Corporation is limited to 40% opacity.
Operating Condition Monitoring:
Operating condition monitoring is not required at this time.
Construction Permit number 73-A-32 can be found in Attachment 10. EP-06 is permitted for the incineration of copper wire insulation. According to the Shine Brothers Storm Water Pollution

Prevention Plan, the incinerator is used to remove weather-proof tar coating from copper wire. The incinerator was not in operation at the time of the inspection. The incinerator afterburner temperature is set at 1700^0 F., although I do not know if the temperature readings are accurate. Mr. Wycoff believes the afterburner temperature setting was a factory setting. A performance test has not been required for the incinerator. Mr. Wycoff told me the incinerator runs approximately 25% of the time.

Construction Permit number 03-A-1295-S1
Modified October 21, 2005
Source: **Shredder (EP-07)**
Control Equipment: **Cyclone**
Compliance Testing Requirements: *PM_{10}, Opacity*
Operating Limits:
Shine Brothers Corporation is limited to 40% opacity. Exceedance of the indicator 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the equipment.
Operating Condition Monitoring:
Operating condition monitoring is not required at this time.

Construction Permit 03-A-1295-S1 can be found in Attachment 11. EP-07 is a 100 tons/hour shredder, used primarily to shred automotive parts and automobiles. A photograph of EP-07 and the control equipment can be found in Attachment 4, Photograph #5.

Emissions from EP-07 are limited to 40% opacity. I observed emissions from the EP-07 cyclone stack during the inspection, however, when viewed with consideration of my position relative to the sun, the emissions I observed were slight, far less than the 40% permitted opacity limit.

Additional Equipment:

During the inspection, we observed a wire chopper, in operation, that is not permitted by IDNR as an emission source. The wire chopper is located outside, southeast of EP-04, and does not have control equipment (see Attachment 4, Photograph #1 for equipment location). Mr. Wycoff told me that the wire chopper has been used on-site for many years, and that he does not know if a construction permit was submitted to IDNR, or if a construction permit is necessary. Ms. Wolf (IDNR) said she would contact the Des Moines office for any additional information about this piece of equipment.

Additional Information:

Following the inspection, Mr. Green and I walked through the City park located adjacent to Shine Brothers Corporation, northeast of the facility. Throughout the park, especially in the areas closer to the Shine Brothers property line, we found fluff. In some areas, the fluff had been carried off of Shine Brothers property by stormwater. In other areas however, the fluff had been air borne, carried off of the Shine Brothers property as fugitive emissions or as stack emissions. The IDNR Spencer office has

responded to numerous citizen complaints of excess emissions and noise from the Shine Brothers facility. One incident, which occurred on or near July 10, 2011, when a cyclone separator within the facility apparently overflowed, caused shredder fluff material to disperse widely throughout the immediate neighborhood.

SUMMARY

I conducted an air compliance inspection at Shine Brothers Corporation, located in Spencer, Iowa.

Shine Brothers is subject to Federal and State air emission requirements.

The equipment associated with Construction Permits 98-A-914, 98-A-917 and 98-A-918 have not been performance tested as required by the Construction Permits. These performance tests requirements should be completed. The control equipment associated with Construction Permits 98-A-914, 98-A-917 and 98-A-918 is not the same as the control equipment used on-site. IDNR and Shine Brothers plan to review these Construction Permits to make the necessary permit modifications and complete the required performance tests.

A wire chopper was observed operating on-site that is not associated with any previously permitted equipment. If Shine Brothers has not applied for a Construction Permit for this piece of equipment, they should apply for a Construction Permit immediately.

I did not observe excess emissions from equipment, or fugitive emissions crossing the Shine Brothers property line. However, the debris I observed on and adjacent to the Shine Brothers property, especially near the control equipment stacks, came from the stacks, and could be carried across the property line onto adjacent properties. Efforts, including housekeeping, should be made to reduce the possibility of air borne particulate matter leaving the Shine Brothers' property.

Sean P. Bergin
Environmental Scientist
Date: 5/2/12

Attachments:

1. Multimedia Screening Checklist, 1 page.
2. Confidentiality Notice, 1 page.
3. Receipt for Documents and Samples, 1 page.
4. Photographs of Shine Brothers , 5 pages.
5. Construction Permit Number 98-A-914, 5 pages.
6. Construction Permit Number 98-A-917, 4 pages.
7. Construction Permit Number 98-A-918, 4 pages.
8. Request Modification of Construction Permit Number 98-A-918, 2 pages.
9. EP-05 Throughput Totals, 6 pages.
10. Construction Permit Number 73-A-32, 2 pages.
11. Construction Permit Number 03-A-1295-S1, 4 pages.

Attachment 1

Forward To: EJ ☐ EPCRA / RMP / TSCA ☐ CWA ☐ Wetlands ☐ UIC ☐ PWS ☐ CAA / CFC ☐ RCRA ☐ UST ☐ SPCC ☐

REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Name: Shire Brothers Corporation
Facility Ownership: _____ Inspector Bergin
Street: 528 East Park Primary Media: Air
City: Spencer State: IA Zip: 51301 Inspector Phone Ext.: 7497
Phone: 712-262-5579 Facility Contact: Mike Wycoff Plant Manager Date: 4/10/12
Number of Employees: 120 Work Hours/Shifts 7-5 p-11:i 24/6 6 days week SIC/NAICS Code 423930
Facility Subject to OSHA regulations Yes ☒ No ☐
Main facility activity, major process chemical(s) & description: Scrap and waste materials

(Check all that apply): painting/coating (water-based ☐, solvent-based ☐), printing ☐, reacting ☐, formulating ☐, distilling ☐, water treatment ☐, refrigeration ☐, manufacturing ☐, parts washers/degreasing (water-based ☒, halogenated-based ☐, non-halogenated-based ☐), combustion (boiler, furnaces, oxidizers) ☐ plating (chrome ☐, other _____). I only degreased parts washer

ENVIRONMENTAL JUSTICE (Note: Forward to EJ if a concern is identified during your inspection)

1. Is the facility located in an apparent low income area (e.g., with many abandoned and dilapidated properties)? No ☒ (stop) Yes ☐
   If yes, is facility less then 1000 feet from nearest routinely occupied property (house, school, etc.)? No ☒ (stop) Yes ☐ *Forward to EJ*

EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SUBSTANCE CONTROL ACT (TSCA)

1. Did facility file a Tier II report with fire department, Local & State Emergency Planning Committee? Yes ☐ No ☒ Don't know *Forward to EPCRA*
2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a chemical or >100 lbs of a Persistent Bioaccumulative Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years? No ☒ (stop) Yes ☐ *Forward to EPCRA*
3. Has the facility: ***If any box in question 3 is marked - Forward to EPCRA***
   a. Stored ≥500 lbs of ammonia ☐, ≥100 lbs of chlorine ☐, or ≥10,000 lbs of an industrial chemical ☐, at any time over the last 2 years? ☐
   b. Stored ≥10,000 lbs of pressurized flammable material (propane, methane, butane, pentane, etc.) at any time over the last 2 years? ☐
   c. Used ≥10,000 lbs of ammonia ☐, chlorine ☐, halogenated solvents ☐, solvent-based paints ☐, or solvents ☐, or nitrated compound, over the last calendar year? ☐
   d. Generated ≥ one half pound of metal dusts, fumes, or metal turnings, over the last calendar year? ☒
4. Does the facility have any oil filled electrical equipment No ☒ (stop) Yes ☐ ***Forward to TSCA and ask*** Has facility tested oil filled equipment to determine PCB content; No ☐ Yes ☐ number containing PCBs greater than 50 ppm _____ and percent of all equipment tested _____. Is equipment leaking (including wet or weeping equipment)? No ☐ Yes ☐ – *Get Photo*

CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any wastewater to storm sewers, surface water, or the land? No ☒ (stop) Yes ☐
   If yes, are all wastewater discharges permitted? Yes ☐ No ☐ ***Forward to CWA***
2. Does the facility have process wastewaters that are discharged to a city POTW (Publicly Owned Treatment Works)? No ☒ (stop) Yes ☐
   If yes, are the discharges permitted by: State? ☐, City? ☐ – If yes, Stop here. No ☐ ***Forward to CWA***
   If yes, does the city have a state or EPA approved pretreatment program? Yes ☐ No or Don't Know ☐ ***Forward to CWA***
3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >1 acre, to storm sewers or surface water? No ☐ (stop) Yes ☒
   If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☒ No ☐ ***Forward to CWA***
4. Did you see any wastewater discharges not identified by the facility? No ☒ (stop) Yes ☐ - Identify location, time, appearance of discharge: _____ (*Get Photo*) ***Forward to CWA***
5. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☒ (stop) Yes ☐
   If yes, have any wetland areas been dredged, filled, channelized, dammed, or had gravel removed from them within the last 5 years? No ☐ (stop) Yes ☐ - Identify location and timeframe _____ (*Get Photo*) ***FWD to Wetlands***

GRAY SHADED AREAS INDICATE ITEMS YOU NEED TO LOOK FOR DURING VISUAL INSPECTION

SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)

1. Does facility discharge any <u>liquids</u> to the subsurface (septic systems, disposal wells, cesspools, etc.)? No ☑ (stop) Yes ☐ *Forward to UIC*
   If yes, do these liquid wastes consist of <u>sanitary wastewater only</u>? Yes ☐ No ☐
2. Does facility provide drinking water to 25 people or more from <u>its own source</u> (private well, pond, etc)? No ☒ (stop) Yes ☐ *Forward to PWS*
   If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☐

CLEAN AIR ACT (CAA) and CFCs

1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No ☑ Yes ☐ *Forward to CAA*
   Source____________________ (*<u>Get Photo</u>*)
2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No ☑ (stop) Yes ☐
   If yes, is equipment permitted? Yes ☑ No ☐ *Forward to CAA* Describe: Shredder 2005
3. Does the facility have any cooling units that contain >50 lbs of refrigerant? No ☒ (stop) Yes ☐ *Forward to CFC*
   If yes, are these units: Self-serviced? ☐ Contract Serviced? ☐ - Service Company:__________
4. Does the facility have a refrigeration process that contains more than 10,000 lbs of ammonia ? No ☐ (stop) Yes ☐ *Forward to EPCRA/RMP*
5. Does the facility service motor vehicle air conditioning systems? No ☐ (stop) Yes ☐ *Forward to CFC*

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)

1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No ☑ (stop) Yes ☐
   If yes, does facility have an EPA Hazardous Waste Identification Number? Yes ☐ (stop) No ☐ *Forward to RCRA*
2. Is hazardous waste treated ☐, stored >90-days ☐, burned ☐, land filled ☐, put in surface impoundments ☐ or waste piles ☐ ?
   No ☐ (stop) Yes ☐ If yes, is the facility permitted for above described activity? Yes ☐ No ☐ *Forward to RCRA*
3. Did you see or does the facility have any large quantities of materials **that the facility claims to be non-hazardous waste material** (>10 drums, roll-offs, waste piles, etc. – exclude clean office trash, cardboard, & packaging type wastes)? No ☐ (stop) Yes ☐

<u>Material Claimed To Be Non-Hazardous</u>	<u>How does the facility know these wastes are non-hazardous?</u>		
__________	Testing, industry or manuf. info.., MSDS, etc. ☐ ;	None available ☐	*Forward to RCRA*
__________	Testing, industry or manuf. info.., MSDS, etc. ☐ ;	None available ☐	*Forward to RCRA*
__________	Testing, industry or manuf. info.., MSDS, etc. ☐ ;	None available ☐	*Forward to RCRA*
__________	Testing, industry or manuf. info.., MSDS, etc. ☐ ;	None available ☐	*Forward to RCRA*
__________	Testing, industry or manuf. info.., MSDS, etc. ☐ ;	None available ☐	*Forward to RCRA*

4. Did you see any leaking hazardous waste containers, drums, or tanks? No ☒ Yes ☐ *Forward to RCRA*
   Describe:____________________ *(<u>Get Photo</u>)*
5. Did you see any signs of <u>spills or releases</u> (e.g., dead or stressed vegetation, stains, discoloration)? No ☑ Yes ☐ *Forward to RCRA*
   Describe:____________________ *(<u>Get Photo</u>)*
6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No ☑ Yes ☐ *Forward to RCRA & EPCRA* Describe:____________________ *(<u>Get Photo</u>)*
7. Does the facility have any <u>past</u> or <u>present</u> underground petroleum product or hazardous material tanks? No ☑ Yes ☐ *Forward to UST*
8. Does the facility have any underground fuel tanks for emergency generators? No ☑ Yes ☐ *Forward to UST*

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

1. Does the facility have any aboveground <u>oil</u> tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume >1,320 gallons?
   No ☐ (stop) Yes ☑ - Does the facility have a certified SPCC Plan? Yes ☑ No ☐ *Forward to SPCC*
   If yes, are there secondary containment systems for the tanks? Yes ☐ No ☐ *Forward to SPCC*
   If yes, are any tanks <u>leaking</u> where oil could reach waters of the State or U.S.? No ☐ Yes ☐ *(<u>Get Photo</u>)* *Forward to SPCC*

ENVIRONMENTAL MANAGEMENT SYSTEMS (EMS)

1. Does your facility have an EMS? No ☑ Yes ☐
2. Is the facility's EMS ISO 14001 certified? No ☑ Yes ☐

***PLEASE TAKE <u>PHOTOS</u> TO DOCUMENT POTENTIAL PROBLEMS**

Version 08.23.05a <u>GRAY SHADED AREAS INDICATE ITEMS **YOU** NEED TO **LOOK** FOR DURING VISUAL INSPECTION</u>

Attachment 2

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name	
Shine Brothers Corp.	
Facility Address	
528 E. Park St. Spencer IA 51301	
Inspector (print)	
PETER M GREEN	
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101	Date 04/10/2012

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. No statute specifically requires disclosure of the information.

3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and DO NOT want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print)	Signature/Date
Mike Wilcoff	4/10/12

I have received this Notice and DO want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested:

(Rev:1/19/00)

Attachment 3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name
SHINE BROTHERS CORP.

Facility Address
528 E. PARK ST. SPENCER, IA 51301

Documents Collected? YES ✓ (list below) NO___

Samples Collected? YES ✓ (list below) NO___ Split Samples: YES ✓ NO___

Documents/Samples were: 1)Received no charge ✓ 2)Borrowed___ 3)Purchased___

Amount Paid: $__________ Method: Cash___ Voucher___ To Be Billed___

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

==

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

FIG. 2B FACILITY MAP from SPCC Plan
GUIDELINES FOR SCRAP MATERIALS, CARS & TANKS (3 p.)
GEN. SAFETY INFORMATION EMPLOYEE TRAINING (12 p.)
SAMPLE TRAINING CERTIFICATION
SAMPLE OF DEBRIS (Fluff from wire chopper) from ground between new pedestal grade bldg + E. chop bldg. (1 oz)
Air permit modification request (EP-05) (2 pgs.)

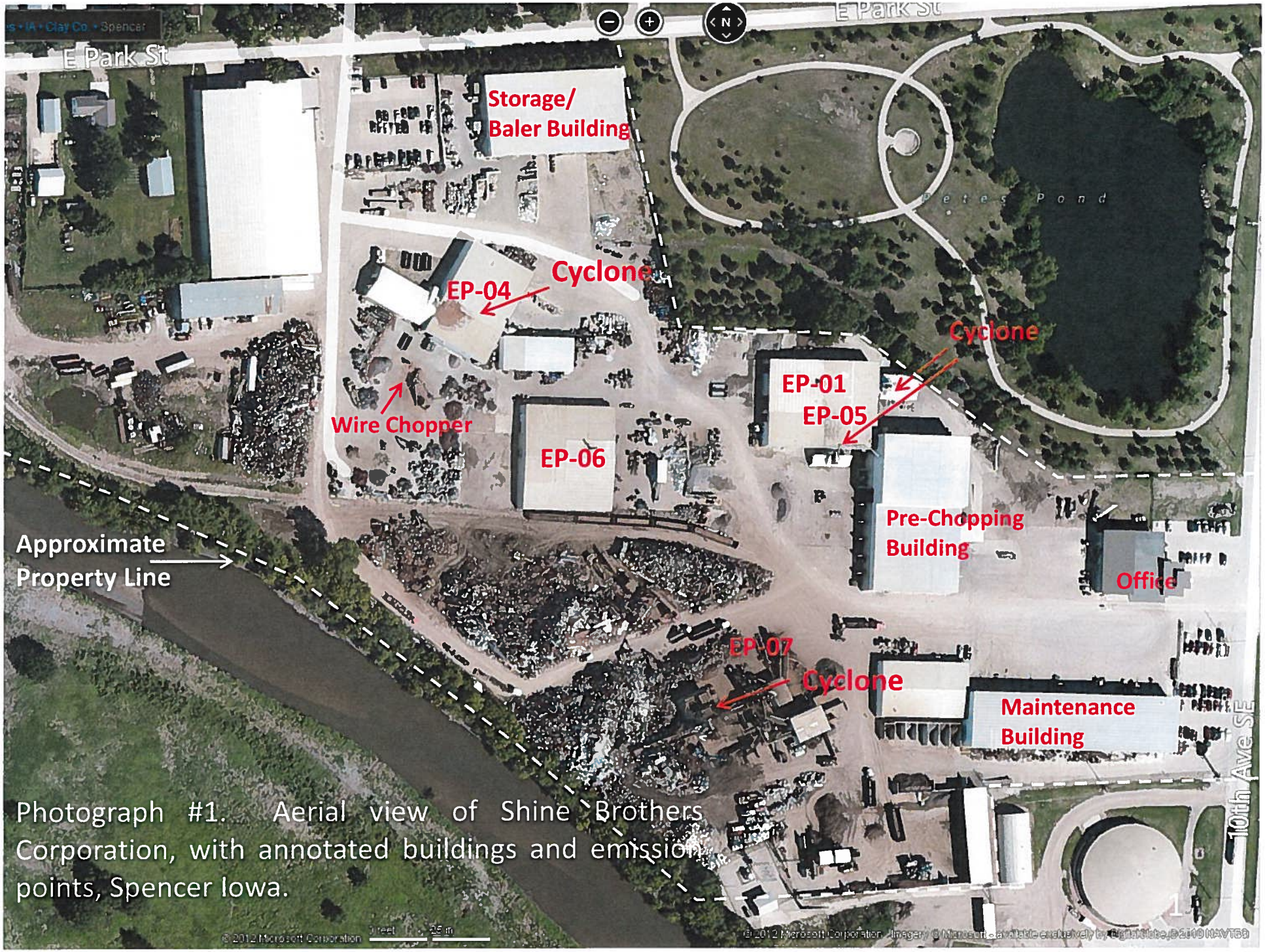
Documents to be provided electronically:
SWPPP Plan
~~EP-04~~ [initialed 4/10/12] and EP-05 throughput estimates

Facility Representative (print)	Signature/Date
Mike Wycoff	[signature] 4/10/12
Inspector (print)	**Signature/Date**
Peter M Green	Peter M Green 04/10/2012

U.S. EPA, Region VII, 901 N. 5th Street, Kansas City, KS 66101

(rev:1/20/93)

Attachment 4



Photograph #1. Aerial view of Shine Brothers Corporation, with annotated buildings and emission points, Spencer Iowa.

Photograph #2. Entrance to the north cyclone area of EP-05. Deposited emissions from the cyclone can be seen on the concrete slab.

Photograph #3. Closer view of deposited stack emissions, found in the same area as Photograph #2.

Photograph #4. The loadout area of the south cyclone, EP-05. Airborne debris can be observed leaving The structure.

Photograph #5. Aerial view of EP-07, and control equipment
(photograph obtained from Shine Brothers, http://www.shinebros.com/).

Attachment 5

Iowa Department of Natural Resources
Construction Permit
For Air Emission Source

Permit Holder

Firm: **Shine Brothers Corporation**

Responsible Party:	Contact:
Mr. Greg Vaughn	**Same**
General Manager	**Same**
(712) 262-5579	**Same**
P.O. Box 737	**Same**
Spencer, IA 51301	**Same**

Source

Source: **Dry Chemical Storage Silo (EP #1)**

Control Equipment: **Baghouse (Belle Style Dust House)**

Location: **528 East Park Street, Spencer, IA 51301**

Plant Number: **21-01-010** Project Number: **98-459**

This equipment has been evaluated for conformance with rule(s) 567 IAC Chapters 20-31 of the Department of Natural Resources (DNR) and found to have the potential to comply.

Under the Direction of the Director of the Department of Natural Resources.

October 22, 1998 (Date) 98-A-914 (Original Permit Number)

Amendment	Description	Date	Permit Number

PERMIT CONDITIONS

The owner or operator of the facility shall assure that the installation, operation, and maintenance of this facility is in compliance with all of the following conditions.

---

1. Departmental Review

This permit is issued based on information submitted by the applicant. **Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to the Iowa Code Section 455B.146A.**

This permit is issued under the authority of 567 Iowa Administrative Code **(IAC)** 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20-30; and 40 CFR Part 60 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions.
The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

---

2. Construction

This permit shall become void if construction of the proposed project has not been initiated within eighteen (18) months after the date of the issuance of this permit and completed within thirty-six (36) months after issuance of this permit.

It is the owner's responsibility to ensure that construction conforms to the plans and specifications and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created. If changes in the final plans and specifications are proposed by the owner after a construction permit has been issued, a supplemental permit shall be obtained.

---

3. Transferability

As required by 567 IAC 22.3(3)"f", this permit is not transferable from the source or control equipment specified on Page 1, or from one location to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least thirty (30) days prior to transferring to the new location. The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the National Ambient Air Quality Standards. In such case, a supplemental permit shall be required prior to the initiation of construction of additional control equipment or equipment modifications needed to meet the standards.

3. Transferability (continued)

This permit is for the construction and operation of the specific source, equipment or control equipment described in this permit and in the application for this permit. **Any** owner or operator of the specified source or control equipment, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible to comply with the provisions of this permit. No person shall construct, install, reconstruct or alter this equipment or control equipment without the required revisions to this permit.

---

4. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP) and any other requirements of local, state, and federal law.

The owner or operator of any air emission source or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions.

---

5. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

---

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. **An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A.** If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time as specified in 567 IAC 24.1.

---

7. Notification, Reporting and Record keeping

A. The owner shall furnish the DNR the following written notifications:

(1) The date construction, installation, or alteration is initiated postmarked within seven (7) days following initiation of construction, installation, or alteration.

(2) The date of intended startup at least ten (10) days before the equipment or control equipment involved is placed into operation.

7. Notification, Reporting and Record keeping (continued)

(3) The actual date of startup postmarked within fifteen (15) days following the start of operation.

(4) The date of each compliance test required by Permit Condition 10 at least thirty (30) days before the anticipated compliance test date.

(5) The date of each pretest meeting at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date.

(6) Transfer of equipment ownership within 30 days of the occurrence.

(7) Portable equipment relocation at least thirty (30) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:

(1) Oral excess emissions in accordance with 567 IAC 24.1.

(2) Written

a. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than forty-five (45) days after the completion of the test period.

b. Operation of this source outside of those limits specified in Permit Conditions 9 and 12, and according to the time limits set forth in 567 IAC 24.1.

C. The owner shall send all notifications, reports and correspondence to:

Mr. Peter Hamlin, Chief
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Urbandale, IA 50322

D. The owner shall send correspondence concerning stack testing to:

Mr. Mark Stone Telephone: (515) 242-6001
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Urbandale, IA 50322

7. Notification, Reporting and Record keeping (continued)

E. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives for a minimum of three (3) years from the date of recording.

---

8. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

---

9. Emission Limits

	lb/hr	tons/year	Concentration
Total Particulate (TSP)	N/A	N/A	0.1 gr/scf[1]
PM_{10}*	0.20[3]	N/A	N/A
Opacity	N/A	N/A	20%[2]
Sulfur Dioxide (SO_2)	N/A	N/A	N/A
Nitrogen Oxides (NO_x)	N/A	N/A	N/A
Volatile Organic Compounds (VOC)	N/A	N/A	N/A
Carbon Monoxide (CO)	N/A	N/A	N/A
Lead (Pb)	N/A	N/A	N/A

N/A = Not Applicable
* particulate matter having an aerodynamic diameter of ten (10) microns or less.
[1] 567 IAC 23.3(2)a
[2] 567 IAC 23.3(2)d
[3] Limit based on air dispersion modeling of the facility.

---

10. Compliance Testing Requirements

	Testing Required	Test Method
TSP	No	Method 5, 40 CFR 60
PM_{10}	Yes	201A with 202, 40 CFR 51*
Opacity	Yes	Method 9, 40 CFR 60
SO_2	No	Method 6C, 40 CFR 60*
NO_x	No	Method 7E, 40 CFR 60*
VOC	No	Method 25A, 40 CFR 60**
CO	No	Method 10, 40 CFR 60*
Pb	No	Method 12, 40 CFR 60***

* or approved alternative
** For total hydrocarbons only; for high concentrations use Method 25B
*** For all metals together use Method 29

10. Compliance Testing Requirements (continued)

If specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 9 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

The tests shall be conducted with the equipment operating in a manner representative of full rated capacity. Failure to test at this maximum may be cause to limit the source to operating at the level at which the compliance tests were conducted.

The following shall apply to all compliance tests:

A. Each test to be conducted shall be approved by the DNR.

B. Unless otherwise specified by the DNR, each test shall consist of three (3) separate runs. The duration shall be established by the DNR at the pretest meeting. The arithmetic mean of the three acceptable test runs shall apply for compliance, unless otherwise approved by the DNR.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Each meeting shall be attended by representatives of the DNR, the owner, and the testing firm, if any. It is the responsibility of the owner to coordinate and schedule each meeting.

The DNR reserves the right to impose additional, different, or more detailed testing requirements. It shall be the responsibility of the owner to install the test ports.

---

11. Source Emission Characteristics

The emission unit shall be connected to the stack designated below.

Stack	Height	Diameter	Temperature	Flowrate
EP #1	26' 10"	3" X 20"	70 °F	1,000 acfm

NOTE: Stack must have an unobstructed, vertical discharge.

---

12. Operating Limits

A. The amount of chemical fed into the silo cannot exceed 50,000 pounds per hour.

---

13. Operating Condition Monitoring

Operating condition monitoring is not required at this time.

---

14. Continuous Emission Monitoring

Continuous emission monitoring shall not be required at this time.

---

15. Definitions

Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
IAC	Iowa Administrative Code
DNR	Iowa Department of Natural Resources
NAAQS	National Ambient Air Quality Standards
Owner	The owner or authorized representative
Permit	The permit document including the permit conditions
SIP	State Implementation Plan
gr/scf	Grains per standard cubic foot
scfm	Standard cubic feet per minute

END OF PERMIT CONDITIONS

Attachment 6

Iowa Department of Natural Resources
Construction Permit
For Air Emission Source

Permit Holder

Firm: **Shine Brothers Corporation**

Responsible Party:	Contact:
Mr. Greg Vaughn	**Same**
General Manager	**Same**
(712) 262-5579	**Same**
P.O. Box 737	**Same**
Spencer, IA 51301	**Same**

Source

Source: **Choppers and Pre-Shredder (EP #4)**

Control Equipment: **Cyclone and Baghouse**

Location: **528 East Park Street, Spencer, IA 51301**

Plant Number: **21-01-010** Project Number: **98-459**

This equipment has been evaluated for conformance with rule(s) 567 IAC Chapters 20-31 of the Department of Natural Resources (DNR) and found to have the potential to comply.

David A. Phelps

Under the Direction of the Director of the Department of Natural Resources.

October 22, 1998 (Date) 98-A-917 (Original Permit Number)

Amendment	Description	Date	Permit Number

PERMIT CONDITIONS

The owner or operator of the facility shall assure that the installation, operation, and maintenance of this facility is in compliance with all of the following conditions.

---

1. Departmental Review

This permit is issued based on information submitted by the applicant. **Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to the Iowa Code Section 455B.146A.**

This permit is issued under the authority of 567 Iowa Administrative Code (**IAC**) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20-30; and 40 CFR Part 60 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions.
The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

---

2. Construction

This permit shall become void if construction of the proposed project has not been initiated within eighteen (18) months after the date of the issuance of this permit and completed within thirty-six (36) months after issuance of this permit.

It is the owner's responsibility to ensure that construction conforms to the plans and specifications and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created. If changes in the final plans and specifications are proposed by the owner after a construction permit has been issued, a supplemental permit shall be obtained.

---

3. Transferability

As required by 567 IAC 22.3(3)"f", this permit is not transferable from the source or control equipment specified on Page 1, or from one location to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least thirty (30) days prior to transferring to the new location. The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the National Ambient Air Quality Standards. In such case, a supplemental permit shall be required prior to the initiation of construction of additional control equipment or equipment modifications needed to meet the standards.

3. Transferability (continued)

This permit is for the construction and operation of the specific source, equipment or control equipment described in this permit and in the application for this permit. **Any** owner or operator of the specified source or control equipment, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible to comply with the provisions of this permit. No person shall construct, install, reconstruct or alter this equipment or control equipment without the required revisions to this permit.

---

4. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP) and any other requirements of local, state, and federal law.

The owner or operator of any air emission source or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions.

---

5. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

---

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. **An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A.** If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time as specified in 567 IAC 24.1.

---

7. Notification, Reporting and Record keeping

A. The owner shall furnish the DNR the following written notifications:

(1) The date construction, installation, or alteration is initiated postmarked within seven (7) days following initiation of construction, installation, or alteration.

(2) The date of intended startup at least ten (10) days before the equipment or control equipment involved is placed into operation.

7. Notification, Reporting and Record keeping (continued)

(3) The actual date of startup postmarked within fifteen (15) days following the start of operation.

(4) The date of each compliance test required by Permit Condition 10 at least thirty (30) days before the anticipated compliance test date.

(5) The date of each pretest meeting at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date.

(6) Transfer of equipment ownership within 30 days of the occurrence.

(7) Portable equipment relocation at least thirty (30) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:

(1) Oral excess emissions in accordance with 567 IAC 24.1.

(2) Written

a. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than forty-five (45) days after the completion of the test period.

b. Operation of this source outside of those limits specified in Permit Conditions 9 and 12, and according to the time limits set forth in 567 IAC 24.1.

C. The owner shall send all notifications, reports and correspondence to:

Mr. Peter Hamlin, Chief
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Urbandale, IA 50322

D. The owner shall send correspondence concerning stack testing to:

Mr. Mark Stone Telephone: (515) 242-6001
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Urbandale, IA 50322

7. Notification, Reporting and Record keeping (continued)

E. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives for a minimum of three (3) years from the date of recording.

---

8. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

---

9. Emission Limits

	lb/hr	tons/year	Concentration
Total Particulate (TSP)	N/A	N/A	0.1 gr/scf[1]
PM_{10}*	1.2[3]	N/A	N/A
Opacity	N/A	N/A	20%[2]
Sulfur Dioxide (SO_2)	N/A	N/A	N/A
Nitrogen Oxides (NO_x)	N/A	N/A	N/A
Volatile Organic Compounds (VOC)	N/A	N/A	N/A
Carbon Monoxide (CO)	N/A	N/A	N/A
Lead (Pb)	0.023[3]	N/A	N/A

N/A = Not Applicable
* particulate matter having an aerodynamic diameter of ten (10) microns or less.
[1] 567 IAC 23.3(2)a
[2] 567 IAC 23.3(2)d
[3] Limit based on air dispersion modeling of the facility.

---

10. Compliance Testing Requirements

	Testing Required	Test Method
TSP	Yes[1]	Method 5, 40 CFR 60
PM_{10}	Yes[1]	201A with 202, 40 CFR 51*
Opacity	No	Method 9, 40 CFR 60
SO_2	No	Method 6C, 40 CFR 60*
NO_x	No	Method 7E, 40 CFR 60*
VOC	No	Method 25A, 40 CFR 60**
CO	No	Method 10, 40 CFR 60*
Pb	Yes	Method 12, 40 CFR 60***

* or approved alternative
** For total hydrocarbons only; for high concentrations use Method 25B
*** For all metals together use Method 29
[1] Test Method 201A with 202, provided that the front half is included with the analysis, will satisfy the testing requirement of TSP.

10. Compliance Testing Requirements (continued)

If specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 9 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

The tests shall be conducted with the equipment operating in a manner representative of full rated capacity. Failure to test at this maximum may be cause to limit the source to operating at the level at which the compliance tests were conducted.

The following shall apply to all compliance tests:

A. Each test to be conducted shall be approved by the DNR.

B. Unless otherwise specified by the DNR, each test shall consist of three (3) separate runs. The duration shall be established by the DNR at the pretest meeting. The arithmetic mean of the three acceptable test runs shall apply for compliance, unless otherwise approved by the DNR.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Each meeting shall be attended by representatives of the DNR, the owner, and the testing firm, if any. It is the responsibility of the owner to coordinate and schedule each meeting.

The DNR reserves the right to impose additional, different, or more detailed testing requirements. It shall be the responsibility of the owner to install the test ports.

---

11. Source Emission Characteristics

The emission unit shall be connected to the stack designated below.

Stack	Height	Diameter	Temperature	Flowrate
EP #4	30′ $10^{3}/_{16}$″	$16^{1}/_{2}$″ X $15^{3}/_{4}$″	70 °F	14,000 acfm

NOTE: Stack must have an unobstructed, vertical discharge.

---

12. Operating Limits

A. The rate of metal fed to the cyclone cannot exceed 1,798 pounds per hour.

---

13. Operating Condition Monitoring

Operating condition monitoring is not required at this time.

---

14. Continuous Emission Monitoring

Continuous emission monitoring shall not be required at this time.

---

15. Definitions

Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
IAC	Iowa Administrative Code
DNR	Iowa Department of Natural Resources
NAAQS	National Ambient Air Quality Standards
Owner	The owner or authorized representative
Permit	The permit document including the permit conditions
SIP	State Implementation Plan
gr/scf	Grains per standard cubic foot
scfm	Standard cubic feet per minute

END OF PERMIT CONDITIONS

Attachment 7

Iowa Department of Natural Resources
Construction Permit
For Air Emission Source

Permit Holder

Firm: **Shine Brothers Corporation**

Responsible Party:	Contact:
Mr. Greg Vaughn	**Same**
General Manager	**Same**
(712) 262-5579	**Same**
P.O. Box 737	**Same**
Spencer, IA 51301	**Same**

Source

Source: **Wire Chopping Process (EP #5)**

Control Equipment: **Cyclone**

Location: **528 East Park Street, Spencer, IA 51301**

Plant Number: **21-01-010** Project Number: **98-459**

This equipment has been evaluated for conformance with rule(s) 567 IAC Chapters 20-31 of the Department of Natural Resources (DNR) and found to have the potential to comply.

Under the Direction of the Director of the Department of Natural Resources.

October 22, 1998 (Date) 98-A-918 (Original Permit Number)

Amendment	Description	Date	Permit Number

PERMIT CONDITIONS

The owner or operator of the facility shall assure that the installation, operation, and maintenance of this facility is in compliance with all of the following conditions.

---

1. Departmental Review

This permit is issued based on information submitted by the applicant. **Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to the Iowa Code Section 455B.146A.**

This permit is issued under the authority of 567 Iowa Administrative Code **(IAC)** 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20-30; and 40 CFR Part 60 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions.
The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

---

2. Construction

This permit shall become void if construction of the proposed project has not been initiated within eighteen (18) months after the date of the issuance of this permit and completed within thirty-six (36) months after issuance of this permit.

It is the owner's responsibility to ensure that construction conforms to the plans and specifications and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created. If changes in the final plans and specifications are proposed by the owner after a construction permit has been issued, a supplemental permit shall be obtained.

---

3. Transferability

As required by 567 IAC 22.3(3)"f", this permit is not transferable from the source or control equipment specified on Page 1, or from one location to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least thirty (30) days prior to transferring to the new location. The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the National Ambient Air Quality Standards. In such case, a supplemental permit shall be required prior to the initiation of construction of additional control equipment or equipment modifications needed to meet the standards.

3. Transferability (continued)

This permit is for the construction and operation of the specific source, equipment or control equipment described in this permit and in the application for this permit. **Any** owner or operator of the specified source or control equipment, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible to comply with the provisions of this permit. No person shall construct, install, reconstruct or alter this equipment or control equipment without the required revisions to this permit.

---

4. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP) and any other requirements of local, state, and federal law.

The owner or operator of any air emission source or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions.

---

5. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

---

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. **An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A.** If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time as specified in 567 IAC 24.1.

---

7. Notification, Reporting and Record keeping

A. The owner shall furnish the DNR the following written notifications:

(1) The date construction, installation, or alteration is initiated postmarked within seven (7) days following initiation of construction, installation, or alteration.

(2) The date of intended startup at least ten (10) days before the equipment or control equipment involved is placed into operation.

7. Notification, Reporting and Record keeping (continued)

(3) The actual date of startup postmarked within fifteen (15) days following the start of operation.

(4) The date of each compliance test required by Permit Condition 10 at least thirty (30) days before the anticipated compliance test date.

(5) The date of each pretest meeting at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date.

(6) Transfer of equipment ownership within 30 days of the occurrence.

(7) Portable equipment relocation at least thirty (30) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:

(1) Oral excess emissions in accordance with 567 IAC 24.1.

(2) Written

a. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than forty-five (45) days after the completion of the test period.

b. Operation of this source outside of those limits specified in Permit Conditions 9 and 12, and according to the time limits set forth in 567 IAC 24.1.

C. The owner shall send all notifications, reports and correspondence to:

Mr. Peter Hamlin, Chief
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Urbandale, IA 50322

D. The owner shall send correspondence concerning stack testing to:

Mr. Mark Stone Telephone: (515) 242-6001
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Urbandale, IA 50322

7. Notification, Reporting and Record keeping (continued)

E. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives for a minimum of three (3) years from the date of recording.

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8. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

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9. Emission Limits

	lb/hr	tons/year	Concentration
Total Particulate (TSP)	N/A	N/A	0.1 gr/scf[1]
PM_{10}*	0.5[3]	N/A	N/A
Opacity	N/A	N/A	20%[2]
Sulfur Dioxide (SO_2)	N/A	N/A	N/A
Nitrogen Oxides (NO_x)	N/A	N/A	N/A
Volatile Organic Compounds (VOC)	N/A	N/A	N/A
Carbon Monoxide (CO)	N/A	N/A	N/A
Lead (Pb)	N/A	N/A	N/A

N/A = Not Applicable
* particulate matter having an aerodynamic diameter of ten (10) microns or less.
[1] 567 IAC 23.3(2)a
[2] 567 IAC 23.3(2)d
[3] Limit based on air dispersion modeling of the facility.

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10. Compliance Testing Requirements

	Testing Required	Test Method
TSP	Yes[1]	Method 5, 40 CFR 60
PM_{10}	Yes[1]	201A with 202, 40 CFR 51*
Opacity	No	Method 9, 40 CFR 60
SO_2	No	Method 6C, 40 CFR 60*
NO_x	No	Method 7E, 40 CFR 60*
VOC	No	Method 25A, 40 CFR 60**
CO	No	Method 10, 40 CFR 60*
Pb	No	Method 12, 40 CFR 60***

* or approved alternative
** For total hydrocarbons only; for high concentrations use Method 25B
*** For all metals together use Method 29
[1] Test Method 201A with 202, provided that the front half is included with the analysis, will satisfy the testing requirement of TSP.

10. Compliance Testing Requirements (continued)

If specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 9 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

The tests shall be conducted with the equipment operating in a manner representative of full rated capacity. Failure to test at this maximum may be cause to limit the source to operating at the level at which the compliance tests were conducted.

The following shall apply to all compliance tests:

A. Each test to be conducted shall be approved by the DNR.

B. Unless otherwise specified by the DNR, each test shall consist of three (3) separate runs. The duration shall be established by the DNR at the pretest meeting. The arithmetic mean of the three acceptable test runs shall apply for compliance, unless otherwise approved by the DNR.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Each meeting shall be attended by representatives of the DNR, the owner, and the testing firm, if any. It is the responsibility of the owner to coordinate and schedule each meeting.

The DNR reserves the right to impose additional, different, or more detailed testing requirements. It shall be the responsibility of the owner to install the test ports.

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11. Source Emission Characteristics

The emission unit shall be connected to the stack designated below.

Stack	Height	Diameter	Temperature	Flowrate
EP #5	13 feet	26" X 29.75"	70 °F	29,000 acfm

NOTE: Stack has a horizontal discharge.

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12. Operating Limits

A. The throughput of the wire chopping process cannot exceed 14,285.7 pounds per hour.

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13. Operating Condition Monitoring

All records, as required below, shall be satisfactory for demonstrating compliance with all applicable operating limits.

Records shall be kept **on-site** for at least three years and shall be available for inspection by the Department. Records shall be maintained in a legible and orderly manner and shall indicate the following:

A. Record the amount of material fed to the process every hour.

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14. Continuous Emission Monitoring

Continuous emission monitoring shall not be required at this time.

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15. Definitions

Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
IAC	Iowa Administrative Code
DNR	Iowa Department of Natural Resources
NAAQS	National Ambient Air Quality Standards
Owner	The owner or authorized representative
Permit	The permit document including the permit conditions
SIP	State Implementation Plan
gr/scf	Grains per standard cubic foot
scfm	Standard cubic feet per minute

END OF PERMIT CONDITIONS

Attachment 8

CPI
Environmental Services, Inc.
799 Roosevelt Rd., Bldg 6, Ste. 110 - Glen Ellyn, Illinois 60137
phone: 630/469-6340 — *fax:* 630/469-6470
www.continentalplacer.com

August 16, 2006

Mr. Chuck Corell
Compliance Section
Iowa DNR Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Subject: Modification Exemption of Air Permit No. 98-A-918
Facility No. 21-01-010

Mr. Corell:

On behalf of our client, Shine Bros., Corp., located at 528 East Park Street, Spencer, IA (Facility No. 21-01-010) CPI Environmental Services, Inc. submits this proposal to modify the air emission control system for the wire chopping line at the above named facility. This system is permitted under Iowa DNR Permit No. 98-A-918.

The existing system consists of a wire chopper controlled by a cyclone. The existing system has one emission point: the cyclone. A second cyclone is being proposed as a system modification to produce a higher quality product. This proposed cyclone will create an additional emission point, while not creating an increase in actual emissions. Our client intends to stay within the permitted operating throughput limit of 14285.7 pounds per hour, just redirect the airflow of the system between two cyclones rather than one as a means of creating a higher quality product. Since there is no increase in throughput, the proposed modification will not result in additional emissions. As such, the modification qualifies for a permit exemption under IAC 567 paragraph 22.1 (2) "i".

It is our client's intention to begin construction for this modification on August 24, 2006.

Should you have any related questions or concerns, please call me at (630) 469-6340, ext. 108. Thank you.

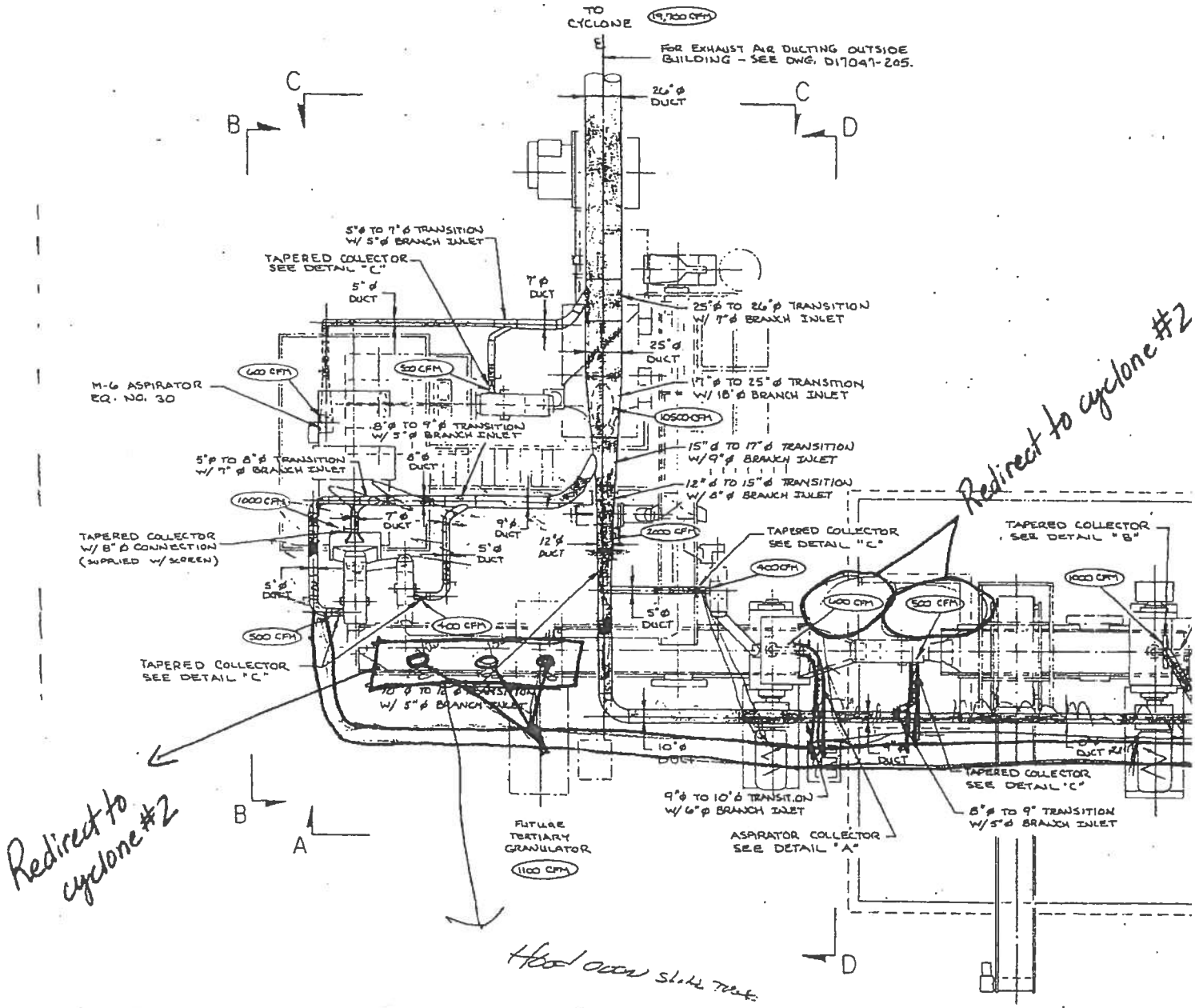
Sincerely,
CPI Environmental Services, Inc.

Deborah Hays

Attachments: Proposed Process Flow Diagram

Pc: Toby Shine, Shine Bros., Corp.

COPY


TO CYCLONE
19,700 CFM
FOR EXHAUST AIR DUCTING OUTSIDE BUILDING - SEE DWG. D17049-205.
26"ø DUCT
5"ø TO 7"ø TRANSITION W/ 5"ø BRANCH INLET
TAPERED COLLECTOR SEE DETAIL "C"
5"ø DUCT
7"ø DUCT
25"ø TO 26"ø TRANSITION W/ 7"ø BRANCH INLET
25"ø DUCT
17"ø TO 25"ø TRANSITION W/ 18"ø BRANCH INLET
10500 CFM
M-6 ASPIRATOR EQ. NO. 30
600 CFM
500 CFM
8"ø TO 9"ø TRANSITION W/ 5"ø BRANCH INLET
8"ø DUCT
15"ø TO 17"ø TRANSITION W/ 9"ø BRANCH INLET
12"ø TO 15"ø TRANSITION W/ 8"ø BRANCH INLET
5"ø TO 8"ø TRANSITION W/ 7"ø BRANCH INLET
1000 CFM
7"ø DUCT
9"ø DUCT
12"ø DUCT
5"ø DUCT
2000 CFM
TAPERED COLLECTOR W/ 8"ø CONNECTION (SUPPLIED W/ SCREEN)
TAPERED COLLECTOR SEE DETAIL "C"
4000 CFM
TAPERED COLLECTOR SEE DETAIL "B"
1000 CFM
600 CFM
500 CFM
5"ø DUCT
500 CFM
400 CFM
TAPERED COLLECTOR SEE DETAIL "C"
10"ø TO 12"ø TRANSITION W/ 5"ø BRANCH INLET
10"ø DUCT
9"ø DUCT
TAPERED COLLECTOR SEE DETAIL "C"
9"ø TO 10"ø TRANSITION W/ 6"ø BRANCH INLET
8"ø TO 9" TRANSITION W/ 5"ø BRANCH INLET
ASPIRATOR COLLECTOR SEE DETAIL "A"
FUTURE TERTIARY GRANULATOR
1100 CFM
A
B
C
D
Redirect to cyclone #2
Redirect to cyclone #2
Hood over slide rail

Production data 2011				
Day shift: 5am start 5pm finish, date listed				
Night shift: 5pm start date listed, 5am finish following date				
Production time in hours				
Throughput in lbs./hr. (rounded up to nearest whole lb.)				
	Night Shift	Night Shift	Day Shift	Day Shift
Date	Production time	Hourly Throuput	Production Time	Hourly Throughput
1/1/2011	0.00	0	0	0
1/2/2011	8.92	7341	0	0
1/3/2011	8.50	8980	11.67	5019
1/4/2011	9.75	7009	10.5	3888
1/5/2011	11.67	7722	8.58	6799
1/6/2011	10.75	6357	10.5	4660
1/7/2011	0.00	0	6.83	7112
1/8/2011	0.00	0	11.17	3871
1/9/2011	10.92	7890	0	0
1/10/2011	7.75	9370	10.67	6921
1/11/2011	10.67	6953	4.33	1572
1/12/2011	9.00	5617	8.75	2692
1/13/2011	10.33	4706	10.58	5730
1/14/2011	7.42	2013	7.17	4053
1/15/2011	11.42	5258	10.5	3845
1/16/2011	0.00	0	0	0
1/17/2011	10.83	7695	10.83	5040
1/18/2011	7.92	4533	9.33	5971
1/19/2011	9.50	8200	8	8178
1/20/2011	8.25	7691	10.33	7537
1/21/2011	10.50	6142	10.42	7495
1/22/2011	0.00	0	11.33	4400
1/23/2011	7.92	8321	0	0
1/24/2011	9.00	5157	10.5	6477
1/25/2011	8.50	6359	9.58	5071
1/26/2011	0.00	0	10.67	7353
1/27/2011	11.00	6106	6.75	2613
1/28/2011	0.00	0	11.67	5482
1/29/2011	0.00	0	0	0
1/30/2011	9.75	8606	0	0
1/31/2011	9.00	5847	9.58	3020
2/1/2011	8.42	5239	9.25	4102
2/2/2011	7.83	7157	10.75	6421
2/3/2011	10.67	4849	10	6470
2/4/2011	11.00	3296	10.08	4587
2/5/2011	0.00	0	10.58	4041
2/6/2011	8.08	6797	0	0
2/7/2011	9.58	6601	10.58	9205
2/8/2011	8.83	6388	11.67	7529

2/9/2011	8.25	8830	7.42	6657
2/10/2011	11.67	8148	6.75	5083
2/11/2011	11.42	6148	10.67	7202
2/12/2011	0.00	0	0	0
2/13/2011	0.00	0	0	0
2/14/2011	7.42	7165	8.92	5472
2/15/2011	2.50	4687	9.33	4740
2/16/2011	4.33	3798	8.67	651
2/17/2011	11.75	5902	0	0
2/18/2011	12.00	3959	10	5039
2/19/2011	0.00	0	9.17	3673
2/20/2011	7.83	4448	0	0
2/21/2011	10.50	9284	10.67	5449
2/22/2011	8.58	6053	9.92	5340
2/23/2011	11.33	6835	10.5	5597
2/24/2011	10.75	7892	10.42	5950
2/25/2011	0.00	0	7.83	5408
2/26/2011	0.00	0	0	0
2/27/2011	9.00	8195	0	0
2/28/2011	10.33	8506	10.33	8308
3/1/2011	11.33	6893	7	5579
3/2/2011	10.08	6852	11.08	7049
3/3/2011	11.66	5364	4	8991
3/4/2011	11.08	5264	11.33	10349
3/5/2011	0.00	0	11	3969
3/6/2011	4.50	7654	0	0
3/7/2011	10.50	7813	11.58	3902
3/8/2011	9.17	5559	10.92	10343
3/9/2011	10.83	6989	10.25	4703
3/10/2011	12.00	8578	6.67	8519
3/11/2011	9.83	4528	7.5	10529
3/12/2011	0.00	0	0	0
3/13/2011	0.00	0	0	0
3/14/2011	7.50	6315	10.25	9249
3/15/2011	12.00	8135	10.08	7494
3/16/2011	8.75	7399	10.5	7438
3/17/2011	12.00	5695	10.92	9812
3/18/2011	0.00	0	11.75	5816
3/19/2011	0.00	0	7.25	3702
3/20/2011	9.42	6409	0	0
3/21/2011	9.83	7945	9.75	6076
3/22/2011	8.00	7736	11.33	6872
3/23/2011	11.67	9893	10.92	7594
3/24/2011	5.50	4551	11.33	8583
3/25/2011	11.17	8768	0	0
3/26/2011	0.00	0	0	0
3/27/2011	7.58	7289	0	0

3/28/2011	7.08	6236	5.08	6167
3/29/2011	7.00	8110	6.17	4747
3/30/2011	10.67	6149	10.67	7080
3/31/2011	9.42	6782	10.67	7713
4/1/2011	11.50	9128	11.17	5244
4/2/2011	11.00	3624	0	0
4/3/2011	0.00	0	9.75	5838
4/4/2011	11.08	5365	11.75	5629
4/5/2011	10.92	5567	9.5	5690
4/6/2011	11.17	6888	12	6169
4/7/2011	11.25	7416	8.5	6891
4/8/2011	10.25	9951	0	0
4/9/2011	0.00	0	0	0
4/10/2011	0.00	0	8.08	6710
4/11/2011	11.00	6922	12622	4401
4/12/2011	11.75	8645	11.17	5350
4/13/2011	11.25	5872	8.5	4315
4/14/2011	0.00	0	10.67	5935
4/15/2011	11.08	9362	11.25	6648
4/16/2011	11.00	5846	0	0
4/17/2011	0.00	0	10.92	4693
4/18/2011	7.42	6916	11.33	6085
4/19/2011	10.84	8559	10.25	7445
4/20/2011	10.92	6918	9	4339
4/21/2011	10.25	8549	11.33	9478
4/22/2011	10.33	9755	0	0
4/23/2011	0.00	0	0	0
4/24/2011	0.00	0	2.42	11527
4/25/2011	7.92	6163	12	6508
4/26/2011	11.00	7988	9.5	9014
4/27/2011	11.00	6213	12	6092
4/28/2011	10.67	5634	9.25	7388
4/29/2011	11.17	6992	10.83	4312
4/30/2011	9.50	2657	0	0
5/1/2011	9.00	6135	0	0
5/2/2011	4.50	2770	8.92	6540
5/3/2011	11.00	10174	10.33	7518
5/4/2011	11.33	10913	7.17	9760
5/5/2011	0.00	0	7.5	11171
5/6/2011	0.00	0	0	0
5/7/2011	0.00	0	5	1621
5/8/2011	10.75	8115	0	0
5/9/2011	9.33	6811	10.33	9226
5/10/2011	9.75	8738	7	5306
5/11/2011	8.67	7103	10.17	5881
5/12/2011	11.75	8240	11.58	8382
5/13/2011	11.00	5005	6.92	6976

5/14/2011	0.00	0	10.5	3577
5/15/2011	6.00	6404	0	0
5/16/2011	10.17	5897	9.08	5485
5/17/2011	10.58	5904	10.42	6389
5/18/2011	4.83	2315	9	8715
5/19/2011	9.75	7554	9.75	7838
5/20/2011	0.00	0	10.67	8870
5/21/2011	0.00	0	0	0
5/22/2011	6.83	6294	0	0
5/23/2011	8.42	5797	10.75	8173
5/24/2011	9.00	5607	11.5	7640
5/25/2011	10.92	5907	9.83	8533
5/26/2011	8.92	7453	11.5	7734
5/27/2011	0.00	0	10.92	9352
5/28/2011	0.00	0	0	0
5/29/2011	0.00	0	0	0
5/30/2011	9.25	5617	0	0
5/31/2011	11.67	8365	10.92	8940
6/1/2011	8.17	5320	11.5	7640
6/2/2011	9.25	10740	10.17	10226
6/3/2011	0.00	0	9.58	8332
6/4/2011	0.00	0	0	0
6/5/2011	9.25	3470	0	0
6/6/2011	11.50	7172	10.5	6229
6/7/2011	8.75	7810	9.83	6478
6/8/2011	4.75	5638	9.75	7823
6/9/2011	11.67	6396	11.08	7930
6/10/2011	0.00	0	10.67	8679
6/11/2011	0.00	0	0	0
6/12/2011	9.75	5876	0	0
6/13/2011	11.42	7459	0	0
6/14/2011	11.00	7988	11.08	7605
6/15/2011	11.00	9107	8.33	7540
6/16/2011	8.00	11361	9.17	7747
6/17/2011	0.00	0	8.25	7653
6/18/2011	0.00	0	0	0
6/19/2011	9.66	10080	0	0
6/20/2011	8.50	5937	10.5	8209
6/21/2011	11.67	5856	11.08	6168
6/22/2011	11.67	5856	8.17	7170
6/23/2011	9.25	6332	11.17	5244
6/24/2011	0.00	0	10.83	7889
6/25/2011	0.00	0	0	0
6/26/2011	11.17	5462	0	0
6/27/2011	4.33	8658	8.92	6688
6/28/2011	9.92	8184	9.58	10345
6/29/2011	10.17	6696	11.08	8975

6/30/2011	12.00	6300	9.83	7046
7/1/2011	0.00	0	10.33	7132
7/2/2011	0.00	0	0	0
7/3/2011	0.00	0	0	0
7/4/2011	7.83	5787	0	0
7/5/2011	9.58	5975	11.58	7646
7/6/2011	7.25	6548	11.5	6059
7/7/2011	10.25	6975	11.17	5513
7/8/2011	0.00	0	10.58	8013
7/9/2011	0.00	0	0	0
7/10/2011	11.00	5165	0	0
7/11/2011	9.50	4169	6.83	7258
7/12/2011	11.58	5220	8.17	7498
7/13/2011	8.25	4000	5.83	6528
7/14/2011	10.00	5616	4.17	10461
7/15/2011	0.00	0	9.92	8592
7/16/2011	0.00	0	0	0
7/17/2011	10.75	6105	0	0
7/18/2011	10.25	5137	10.33	6843
7/19/2011	0.00	0	8	7902
7/20/2011	9.92	5101	8	4660
7/21/2011	8.83	8142	10.25	10132
7/22/2011	0.00	0	8.42	12471
7/23/2011	0.00	0	0	0
7/24/2011	9.58	8562	0	0
7/25/2011	11.25	2748	6.83	9364
7/26/2011	8.25	8096	9.92	7651
7/27/2011	11.67	8188	10	5456
7/28/2011	11.50	6973	8.67	8122
7/29/2011	0.00	0	11	6572
7/30/2011	0.00	0	0	0
7/31/2011	9.00	3462	0	0
8/1/2011	11.50	1297	10.58	7382
8/2/2011	12.00	6489	9.42	7255
8/3/2011	9.00	5119	10.67	6405
8/4/2011	11.00	5230	11	7349
8/5/2011	0.00	0	10.17	6655
8/6/2011	0.00	0	0	0
8/7/2011	11.33	4742	0	0
8/8/2011	6.00	5135	11.42	7153
8/9/2011	10.67	2969	4.92	8142
8/10/2011	10.08	8808	10.67	10445
8/11/2011	7.08	9755	9.66	7892
8/12/2011	0.00	0	9.75	11335
8/13/2011	0.00	0	0	0
8/14/2011	7.58	9006	0	0
8/15/2011	10.92	8046	8.83	10621

8/16/2011	8.68	6756	9.58	9171
8/17/2011	11.42	6839	10.75	9989
8/18/2011	8.25	5846	10.58	8305
8/19/2011	0.00	0	7.42	6672
8/20/2011	0.00	0	0	0
8/21/2011	9.75	4760	0	0
8/22/2011	11.67	7329	11.25	7810
8/23/2011	9.75	6206	8.42	9.68
8/24/2011	11.50	7925	5.25	8672
8/25/2011	10.08	9029	1	7324
8/26/2011	0.00	0	0	0
8/27/2011	0.00	0	0	0
8/28/2011	10.75	5833	9.17	7536
8/29/2011	10.08	9288	6.25	9252
8/30/2011	0.00	0	4.58	6897
8/31/2011	10.50	7266	7.75	7524
9/1/2011	6.83	7106	9.83	5003
9/2/2011	0.00	0	9.42	7579
9/3/2011	0.00	0	0	0
9/4/2011	0.00	0	0	0
9/5/2011	10.83	6751	0	0
9/6/2011	7.08	6895	10.08	5015
9/7/2011	11.50	7205	8.92	8168
9/8/2011	9.83	6747	8.17	7415
9/9/2011	0.00	0	8.92	8438
9/10/2011	0.00	0	0	0
9/11/2011	5.50	6038	0	0
9/12/2011	6.42	5310	7.75	7484
9/13/2011	5.33	10972	8	8309
9/14/2011	7.25	9527	5	8048
9/15/2011	7.17	7748	8.75	8055
9/16/2011	0.00	0	4	5262
9/17/2011	0.00	0	0	0
9/18/2011	6.92	7195	0	0
9/19/2011	2.84	11039	6.08	8924
9/20/2011	5.92	9484	5.25	3602
9/21/2011	0.00	0	3.92	11528
9/22/2011	0.00	0	0	0
9/23/2011	0.00	0	4.92	10687
9/24/2011	0.00	0	0	0
9/25/2011	5.73	11807	0	0
9/26/2011	4.75	7158	5.92	8567
9/27/2011	3.92	9314	2.83	7781
9/28/2011	6.83	8805	6.25	9378
9/29/2011	8.75	3464	7.67	6310
9/30/2011	0.00	0	7.5	10199
10/1/2011	0.00	0	0	0

10/2/2011	5.75	11060	0	0
10/3/2011	0.00	0	3.83	10010
10/4/2011	6.00	8509	5.25	10490
10/5/2011	6.83	9198	5.33	7368
10/6/2011	4.67	7693	5.83	8732
10/7/2011	0.00	0	5.17	6902
10/8/2011	0.00	0	0	0
10/9/2011	6.42	8367	0	0
10/10/2011	6.00	5648	5.33	9873
10/11/2011	7.17	9276	5.5	8390
10/12/2011	4.00	6957	5	9995
10/13/2011	6.42	5097	0.25	3710
10/14/2011	0.00	0	4.25	10866
10/15/2011	0.00	0	0	0
10/16/2011	6.33	6255	0	0
10/17/2011	0.00	0	3.67	11135
10/18/2011	4.23	7798	3.25	8411
10/19/2011	0.00	0	4.92	10790
10/20/2011	0.00	0	5.23	7208
10/21/2011	0.00	0	5.17	8591
10/22/2011	0.00	0	0	0
10/23/2011	0.00	0	0	0
10/24/2011	0.00	0	1.25	5047
10/25/2011	0.00	0	5.08	9853
10/26/2011	5.33	8138	5.08	10803
10/27/2011	6.42	7490	6.25	9656
10/28/2011	0.00	0	4.58	10557
10/29/2011	0.00	0	0	0
10/30/2011	3.08	4099	0	0
10/31/2011	6.42	6942	6.33	7222
11/1/2011	7.17	7436	4.33	5272
11/2/2011	7.67	9952	5.83	9316
11/3/2011	7.25	7621	4	9440
11/4/2011	0.00	0	5.58	10296
11/5/2011	0.00	0	0	0
11/6/2011	5.50	7033	0	0
11/7/2011	5.92	9794	4	9585
11/8/2011	3.66	7404	5.5	11222
11/9/2011	6.75	7861	5.08	8628
11/10/2011	4.66	9332	5.25	3719
11/11/2011	0.00	0	5.33	6806
11/12/2011	0.00	0	0	0
11/13/2011	4.00	10890	0	0
11/14/2011	7.17	7805	5.92	12649
11/15/2011	5.25	10157	3.33	7450
11/16/2011	6.00	10325	4.92	11120
11/17/2011	6.58	9336	5.42	8070

11/18/2011	0.00	0	3.25	9539
11/19/2011	0.00	0	0	0
11/20/2011	7.00	9294	0	0
11/21/2011	7.17	9588	6.42	9788
11/22/2011	5.92	6916	2.5	7138
11/23/2011	0.00	0	4.92	7372
11/24/2011	0.00	0	0	0
11/25/2011	0.00	0	0	0
11/26/2011	0.00	0	0	0
11/27/2011	6.08	7484	0	0
11/28/2011	5.33	8717	4.92	8494
11/29/2011	6.33	11234	6.5	8408
11/30/2011	9.00	6894	6.33	8086
12/1/2011	6.17	9643	5.58	9390
12/2/2011	0.00	0	4.83	11087
12/3/2011	0.00	0	0	0
12/4/2011	1.75	9293	0	0
12/5/2011	6.33	10849	1.08	7226
12/6/2011	6.67	8296	5.25	8289
12/7/2011	5.50	9222	7.25	10092
12/8/2011	7.17	10519	2.75	7146
12/9/2011	0.00	0	6.25	11689
12/10/2011	0.00	0	0	0
12/11/2011	5.25	5374	0	0
12/12/2011	6.17	9775	5	9051
12/13/2011	5.92	8963	6.42	8386
12/14/2011	5.67	8317	1	6154
12/15/2011	8.17	5975	5.5	6829
12/16/2011	0.00	0	5.42	7886
12/17/2011	0.00	0	0	0
12/18/2011	6.92	7690	0	0
12/19/2011	7.17	6104	3.42	8633
12/20/2011	7.08	7498	5.75	8329
12/21/2011	2.58	10032	7.42	6039
12/22/2011	4.58	9995	6.5	11013
12/23/2011	0.00	0	7.84	10490
12/24/2011	0.00	0	0	0
12/25/2011	0.00	0	0	0
12/26/2011	6.08	9039	0	0
12/27/2011	4.92	9491	6.5	5092
12/28/2011	5.92	7389	3.5	10146
12/29/2011	7.00	7041	5.83	8449
12/30/2011	0.00	0	5.42	9574
12/31/2011	0.00	0	0	0

Production 2012				
Day shift: 5am start 5pm finish, date listed				
Night shift: 5pm start date listed, 5am finish following date				
Production time in hours				
Throughput in lbs./hr. (rounded up to nearest whole lb.)				
	Night Shift	Night Shift	Day Shift	Day Shift
Date	Production time	Hourly Throuput	Production Time	Hourly Throughput
1/1/2012	0.00	0	0	0
1/2/2012	3.92	9925	0	0
1/3/2012	7.17	8412	6.42	9426
1/4/2012	6.67	7824	2.67	5420
1/5/2012	6.17	8804	5.67	86.9
1/6/2012	0.00	0	5.92	8327
1/7/2012	0.00	0	0	0
1/8/2012	3.92	10310	0	0
1/9/2012	6.50	11749	5.17	11558
1/10/2012	6.25	4515	1.42	5987
1/11/2012	8.33	6816	3	6257
1/12/2012	6.50	9653	6.33	9467
1/13/2012	0.00	0	6.75	8794
1/14/2012	0.00	0	7.08	5220
1/15/2012	5.83	10964	6.33	11722
1/16/2012	6.67	5064	8.33	10685
1/17/2012	4.42	9383	7.75	11418
1/18/2012	5.48	9884	6.85	9236
1/19/2012	8.42	8072	7.67	4333
1/20/2012	0.00	0	5.75	5223
1/21/2012	0.00	0	0	0
1/22/2012	6.00	8724	0	0
1/23/2012	4.25	11528	5.59	3583
1/24/2012	7.17	10935	6.84	10022
1/25/2012	5.67	11272	5.25	9408
1/26/2012	4.00	11627	6	7035
1/27/2012	0.00	0	6.67	7339
1/28/2012	0.00	0	0	0
1/29/2012	7.50	8256	0	0
1/30/2012	8.34	7711	5.34	10954
1/31/2012	6.75	7690	5.17	9497
2/1/2012	6.50	8628	6.67	8916
2/2/2012	8.59	6332	6.75	8290
2/3/2012	0.00	0	5.42	9589
2/4/2012	0.00	0	3.59	5238
2/5/2012	8.34	5999	0	0
2/6/2012	6.00	8620	6.67	9215
2/7/2012	4.09	7613	7	3497
2/8/2012	7.25	8230	5.5	10506

2/9/2012	6.92	9519	6.75	10546
2/10/2012	0.00	0	4.75	8755
2/11/2012	0.00	0	0	0
2/12/2012	6.75	10492	0	0
2/13/2012	5.92	10964	6.5	11066
2/14/2012	7.67	6780	4.34	11912
2/15/2012	8.09	3816	6.25	7103
2/16/2012	9.50	7968	4.84	10401
2/17/2012	0.00	0	6	9128
2/18/2012	0.00	0	0	0
2/19/2012	4.84	7437	0	0
2/20/2012	6.42	8295	7	9755
2/21/2012	4.25	9815	4.09	7278
2/22/2012	8.17	5261	6.67	6044
2/23/2012	7.84	6052	7.59	4991
2/24/2012	2.17	2236	3.34	6909
2/25/2012	0.00	0	5.92	7344
2/26/2012	8.17	5800	0	0
2/27/2012	9.34	7229	8.17	11932
2/28/2012	4.42	8680	10.17	11321
2/29/2012	8.92	8133	9.09	10210
3/1/2012	6.34	4859	8.25	7553
3/2/2012	0.00	0	9.5	12013
3/3/2012	0.00	0	0	0
3/4/2012	8.34	6108	0	0
3/5/2012	10.42	9209	7.34	12033
3/6/2012	9.84	3000	7	9480
3/7/2012	9.34	6535	4.84	5591
3/8/2012	10.84	7739	9.17	11583
3/9/2012	0.00	0	6.25	9511
3/10/2012	0.00	0	0	0
3/11/2012	10.25	5908	0	0
3/12/2012	10.34	6274	8.84	8619
3/13/2012	8.34	9247	8.34	5742
3/14/2012	11.34	10093	9.17	7423
3/15/2012	0.00	0	7.75	5602
3/16/2012	0.00	0	8.75	6638
3/17/2012	0.00	0	0	0
3/18/2012	11.00	4263	0	0
3/19/2012	10.00	7005	7.42	9182
3/20/2012	0.00	0	5.5	5051
3/21/2012	10.42	8195	8	2978
3/22/2012	9.42	5273	8.84	10018
3/23/2012	0.00	0	7.5	5526
3/24/2012	0.00	0	0	0
3/25/2012	10.59	6027	0	0
3/26/2012	7.34	7385	7.75	5967

3/27/2012	9.75	6602	8	7094
3/28/2012	10.34	6917	4.5	12937
3/29/2012	10.42	4351	9	8199
3/30/2012	0.00	0	6.84	9400
3/31/2012	0.00	0	0	0
4/1/2012	10.50	7210	0	0
4/2/2012	6.42	6557	9.17	7385
4/3/2012	10.25	6279	8.84	8008
4/4/2012	10.50	8367	8.67	6064
4/5/2012	6.84	8572	8.75	8996
4/6/2012	0.00	0	5.42	8484
4/7/2012	0.00	0	0	0
4/8/2012	7.25	5056	0	0
4/9/2012	2.50	2113	7.09	7559
4/10/2012	9.25	7594	7.25	10509

Attachment 10

STATE OF IOWA

Department of Environmental Quality

Kenneth M. Karch, P.E. *Executive Director*

LUCAS STATE OFFICE BUILDING

Des Moines, Iowa 50319

515/281-3045

February 1, 1973

Mr. Toby Shine
Shine Brothers
East Park and 7th Avenue
Spencer, Iowa 51301

Re: Permit No. 73-A-32
Incinerator

Dear Sir:

In accordance with provisions specified in Chapter 455B, Code of Iowa, 1973, this permit is issued for the installation of an incinerator at Shine Brothers, Spencer, Iowa, for which plans and appropriate supplementary information have been received in this Department. This permit is issued subject to the following conditions and requirements:

1. This equipment for incineration of copper wire insulation has been evaluated with respect to potential conformance with the specified emission standards of zero point three five (0.35) grain of particulate matter per standard cubic foot of exhaust gas adjusted to 12 percent carbon dioxide, excluding that added by the gas burners, and of smoke having a density less than Number 2 on the Ringelmann Chart or forty (40) percent opacity; and this permit will become void and a new permit will be required for additional or replacement equipment, if field tests after installation show that the unit will not meet the specified emission standards.

2. This permit implies no review of various engineering aspects of this installation other than the potential of the equipment involved for reducing emissions. This agency assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment.

3. The permit requirements of the Iowa Water Quality Management Division applicable to the sludge treatment system shall be met.

4. This Department shall be provided appropriate notice at least ten (10) days before the incinerator is placed in operation.

5. This permit becomes void if construction of the installation is not started before April 1, 1973.

This permit is issued on the basis that the owner has the responsibility for assuring that the construction will conform with that shown on The United Corporation Incinerators, specifications and drawing for the Model G-466 packaged incinerator with 500,000 BTU/HR igniter and 400,000 to 600,000 BTU/HR afterburners, and that adequate operation and maintenance will be provided to the facilities installed such that no condition of air pollution will be created. The issuing of this permit in no way relieves the owner of responsibility for compliance with all local, state, and federal laws, ordinances, regulations, or other requirements applying to this installation.

We are retaining one copy of the drawings and supplementary data for our records and returning one copy for the files of the owner. A copy of this permit and application form will be sent to the Clay County Board of Health and to Mr. Wayne Wills. As this letter constitutes an official permit, it should be retained in the files of the owner at the incinerator site.

Under the direction of the Iowa Air Quality Commission.

Sincerely,

AIR QUALITY MANAGEMENT DIVISION

Leo Classen, Chief
Engineering Services Section

LC:jlh

Enclosures

cc: Clay County Board of Health
Mr. Wayne Wills
Regional Representative, Spencer

ISDH USE ONLY
DENIED FOR:
Inc. Det. ☐
Inc. Calc. ☐
Inc. Desc. ☐

RECEIVED
JAN 18 1973
STATE OF IOWA
DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY MANAGEMENT

IOWA AIR POLLUTION CONTROL COMMISSION
IOWA STATE DEPARTMENT OF HEALTH
Lucas State Office Building
Des Moines, Iowa 50319

APPLICATION FOR A PERMIT
TO INSTALL OR ALTER
EQUIPMENT OR CONTROL EQUIPMENT

ISDH USE ONLY		
		Date By
Perm.	73-A-32	
Plant	21-01-010	
Recd.	1-18-73	DOV
App.	2-1-73	LE
Cond.		
Constr.		
Oper.		
Denied		

73-27

SUBMIT APPLICATION IN TRIPLICATE, ENCLOSURES IN DUPLICATE

FIRM NAME Shine Brothers

MAILING ADDRESS East Park & 7th Avenue

EQUIPMENT LOCATION ADDRESS same

CITY Spencer STATE Iowa ZIP CODE 51301

NAME AND TITLE OF PERSON TO CONTACT REGARDING THIS PERMIT APPLICATION: Toby Shine (Name); (Title); 712/262-5579 (Phone)

Application is hereby made for the installation or alteration, in accordance with Subsection 5.7, Chapter 136B, Code of Iowa, for the following equipment:

To install one model G466 300# per hour class VI incinerator with pollution abatement system. ~~Manufactured by United Corporation of Topeka, Kansas~~

General Nature of Business Salvage yard

ENGINEER SUBMITTING PLANS

CHARLES R. LOGAN (Name) — KANSAS 6225, MO. E-16302, INDIANA 14786 (P. E. Number)

1600 N.E. Colbert St. (Address) — 816-452-9556 (Phone)

GLADSTONE, MO. (City) (State) 64118 (Zip Code)

I, the undersigned, do hereby submit, in behalf of the firm listed above, this application for a permit to install or alter the equipment or control equipment described in the required information attached hereto.

Toby B. Shine
(Signature)
1-17-73

Attachment 11

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Shine Brothers

Contact:

Toby Shine
President

(712) 262-5579

Box 737 528 East Park Street
Spencer, IA 51301

Responsible Party:

Toby B. Shine
President

Permitted Equipment

Emission Unit(s): Shredder (100 tons/hour)

Control Equipment: Cyclone

Emission Point: EP 7

Equipment Location: 528 East Park Street
Spencer IA

Plant Number: 21-01-010

Permit No.	Proj. No.	Description	Date	Testing
03-A-1295	03-713	Original Permit	December 8, 20003	Yes
03-A-1295-S1	05-573	Change Stack Characteristics	October 21, 2005	Yes

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20-31; and 40 CFR Parts 51, 52, 60, 61 and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f", this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least thirty (30) days prior to transferring to the new location (See 8.A.7). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the National Ambient Air Quality Standards. In such case, a supplemental permit shall be required prior to the initiation of construction of additional control equipment or equipment modifications needed to meet the standards.

This permit is for the construction and operation of the specific emission unit(s), control equipment and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emission unit, control equipment or emission point without the required revisions to this permit.

3. Construction

This permit shall become void if construction on the proposed project has not been initiated within eighteen (18) months after the date of the issuance of this permit and completed within thirty-six (36) months after the date of the issuance of this permit.

It shall be the responsibility of the owner to ensure that construction conforms to the final plans and specifications as submitted and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created. A supplement to this permit shall be obtained if the owner proposes changes to the final submitted plans and specifications.

4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 31.

5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

6. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

7. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

8. Notification, Reporting and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation, at least thirty (30) days before equipment relocation.

8. Notification, Reporting and Recordkeeping (Continued)

B. The owner shall furnish DNR with the following reports:
1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
2. Indicator opacity reports in accordance with Opacity Policy 3-b-08 (See footnote 3, Permit Condition 10);
3. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than forty-five (45) days after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
4. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following addresses:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Urbandale, IA 50322
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322
Telephone: (515) 242-6001
FAX: (515) 242-5127

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Urbandale, IA 50322 Telephone: (515) 281-8448 Fax: (515) 242-5127	Iowa Department of Natural Resources Field Office #3 1900 North Grand Avenue Spencer, IA 51301 Phone: (712) 262-4177 Fax: (712) 262-2901

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	Tons/Yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	6.86[4]	NA	0.1 gr/dscf	23.3(2)"a"
PM_{10}	6.86[4]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	23.3(3)
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	NA	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

[1] Standard is expressed as the average of 3 runs
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Emission rate based on air dispersion modeling.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below.

Parameter	Value
Stack Height, (ft, from the ground)	18.7 feet
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	36 in. dia.
Exhaust Temperature (°F)	Ambient (70 °F)
Exhaust Flowrate (scfm)	13,800 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Initial Performance Testing Requirements

Pollutant	Testing Required	Test Run Time	Test Method
PM (State)	No	1 hour	Iowa Compliance Sampling Manual Method 5
PM_{10}	Yes	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	Yes	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	No	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	No	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	No	1 hour	40 CFR 60, Appendix A, Method 25A
CO	No	1 hour	40 CFR 60, Appendix A, Method 10
Pb	No	1 hour	40 CFR 60, Appendix A, Method 12
Other	No	TBD	

If specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within 90 days after the issuance of this permit. The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the DNR. Unless otherwise specified by the DNR, each test shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the DNR. The test methods and run times to be used are those stated above unless otherwise approved by the DNR.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the DNR shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The DNR shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

There are no New Source Performance Standards (NSPS) for this source type at this time.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) for this source type at this time.

14. Operating Limits

No operating limitations will be imposed at this time.

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

No operating condition monitoring will be required at this time.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Descriptions of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS